

REMARKS

In the Final Office Action, the Examiner rejected claims 1, 3, 4, 6-10, 12, 14-18, and 23-26 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Pub. No. 2002/0184401 to Kadel et al. ("Kadel") and U.S. Pub. No. 2005/0005261 to Severin ("Severin"). The Examiner also rejected claims 20-22 under 35 U.S.C. § 103(a) as being unpatentable over *Kadel*, *Severin*, and U.S. Patent No. 6,920,461 to Hejlsberg et al. ("Hejlsberg").

Applicants amend claims 1, 10, 12, and 18. Claims 1, 3, 4, 6-10, 12, 14-18, and 20-26 are pending.

Applicants respectfully traverse the rejection of claims 1, 3, 4, 6-10, 12, 14-18, and 23-26 under 35 U.S.C. § 103(a) as being unpatentable over *Kadel* and *Severin*.

Amended independent claim 1 recites a computer-readable storage device storing a computer program product for deriving a metadata API from a metamodel in order to develop an application, that causes an apparatus to:

generate code that is included in the API, using the set of intermediate objects as inputs, wherein the API enables development tools to access the development objects to develop the application.

Combinations of *Kadel* and *Severin* fail to teach or suggest at least the claimed "API."

In Figure 1, *Kadel* discloses two modular software components: data source component 102 and data consumer component 122. *Kadel*, ¶ [0088]. Data source component 102 handles data intake or retrieval, while data consumer component 122 handles data computation and presentation. *Kadel*, ¶ [0088]. Data source component

102 and data consumer component 122 communicate with each other by making function calls to API 112. *Kadel*, ¶ [0091].

Kadel's API 112 does not constitute the claimed "API" at least because *Kadel* does not teach or suggest that "the API enables development tools to access the development objects to develop the application," as recited in claim 1 (emphasis added). Instead, *Kadel*'s API allows data source component 102 to access data consumer component 122, neither of which are "development tools," as claimed. And any communication between data source component 102 and data consumer component 122 is used for an existing application to function (see *Kadel*, ¶ [0094]), and is not used to "develop the application," as recited in claim 1 (emphasis added).

Moreover, *Kadel* is silent with respect to any aspect of generating API 112, and therefore, cannot teach or suggest an apparatus configured to "generate code that is included in the API, using the set of intermediate objects as inputs," as recited in claim 1 (emphasis added).

Severin fails to remedy the deficiencies of *Kadel* by also failing to teach or suggest at least the claimed "API," nor does the Examiner allege such. Accordingly, combinations of *Kadel* and *Severin* fail to teach or suggest claim 1. Independent claims 10 and 18, while of different scope than claim 1, distinguish over *Kadel* and *Severin* for reasons similar to claim 1. Claims 3, 4, 6-9, 12, 14-17, and 23-26 are patentable at least due to their dependence from one of the independent claims.

Applicants respectfully traverse the rejection of claims 20-22 under 35 U.S.C. § 103(a) as being unpatentable over *Kadel*, *Severin*, and *Hejlsberg*. Each of claims 20-22 depend from one of the independent claims. As discussed, *Kadel* and *Severin*

fail to teach or suggest the independent claims. *Hejlsberg* fails to remedy these deficiencies by also failing to teach or suggest the above-identified recitations of claim 1, and similar recitations of claims 10 and 18. For at least these reasons, combinations of *Kadel*, *Severin*, and *Hejlsberg* fail to teach or suggest any of claims 20-22.

Applicants respectfully request that the Examiner enter this Amendment under 37 C.F.R. § 1.116, placing the claims in condition for allowance.

In view of the foregoing, Applicants submit that the claims are neither anticipated nor rendered obvious in view of the applied references. Applicants therefore request the entry of this Amendment, the Examiner's reconsideration of the application, and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account 06-0916.

Respectfully submitted,

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By: _____


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